

**FILED**

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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

GARY M. RESTAINO  
United States Attorney  
District of Arizona  
BRANDON M. BOLLING  
Assistant United States Attorney  
United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: brandon.bolling@usdoj.gov  
Attorneys for Plaintiff

**CR21-03199 TUC-RM(MSA)**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

No.

Plaintiff,

**INDICTMENT**

vs.

VIO: 18 U.S.C. § 554(a)  
(Smuggling Goods from the United States)

Jesus Manuel Solano-Torres,

18 U.S.C. § 924(d); and 28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

Defendant.

**THE GRAND JURY CHARGES:**

**COUNT 1**

On or about November 21, 2021, in the District of Arizona, Defendant JESUS MANUEL SOLANO-TORRES knowingly and fraudulently exported and sent from the United States, and attempted to export and send from the United States any merchandise, article, or object contrary to any law or regulation of the United States, and received, concealed, bought, sold, and in any manner facilitated the transportation, concealment, and sale of such merchandise, article or object, that is: one thousand four hundred (1400) rounds of 5.56 x 45 ammunition, knowing the same to be intended for exportation contrary to any law or regulation of the United States, to wit: Title 50, United States Code, Section 4819, and Title 15, Code of Federal Regulations, Parts 736.2, 738, and 774.

All in violation of Title 18, United States Code, Section 554(a).

**FORFEITURE ALLEGATION**

Upon conviction of Count One of this Indictment, the defendant, JESUS MANUEL SOLANO-TORRES, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any ammunition involved in the commission of the offense, including, but not limited to: one thousand four hundred (1400) rounds of 5.56 x 45 ammunition.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Sections 924(d) and 981(a)(1)(C); Title 28, United States Code, Section 2461(c); Title 50, United States Code, Section 4819(d)(1)(A); and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

**/s/**

FOREPERSON OF THE GRAND JURY  
Dated: December 15, 2021

GARY M. RESTAINO  
United States Attorney  
District of Arizona

**/s/**

BRANDON M. BOLLING  
Assistant U.S. Attorney

**REDACTED FOR  
PUBLIC DISCLOSURE**